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December 31, 2009

Via Email: jkim@rhakimlaw.com

Via Facsimile (718) 321-9799

and Mail

Rha & Kim LLP

10-45 Utopia Parkway

Flushing, N. Y. 11358

Attn: Jenny Kim, Esq.

Re: Nanyuan Shipping Co. Limited v. Chorus Shipping Co. Ltd.

E.D.N.Y. Case No.: 09-Civ-5388 (SLT)

Our ref.: 08-1481

Dear Ms. Kim,

As you know, we represent the Plaintiff, Nanyuan Shipping Co. Limited, in the above referenced action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure.

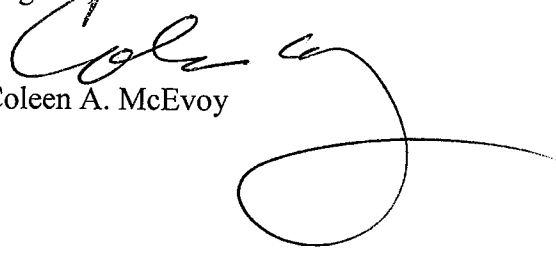
We have confirmed that service of the Interrogatories and Complaint (which Complaint was previously served personally on Dong Ik Lee and IES Logistics Corp. with Process and Ex Parte Order on December 17, 2009) was made yesterday, December 30, 2009, on garnishees. A copy of the Interrogatories is attached hereto.

As attorney for Chorus Shipping Co. Ltd., you instructed the Southern District of New York Court Registry to release the property of Chorus Shipping Co. Ltd. by check payable to **DONG IK LEE in the amount of \$233,714.49 Check No. 00884120 dated 12/15/2009 PICKED UP BY DUJEONG KIM** (you) on December 16, 2009 (see attached Court Registry Notice); therefore, we repeat our multiple requests that you, and by copy, all garnishees, promptly advise our office whether personal service of the Ex Parte Order and Writ on Rha & Kim, LLP and other garnishees on December 17, 2009 has served to attach tangible or intangible property of Chorus Shipping Co. Ltd. in the possession of Rha & Kim and/or other garnishees and/or in the possession of the agent(s) and/or banking institutions of Rha & Kim and/or other garnishees. Please be advised that as garnishee Rha & Kim and/or other garnishees are obligated to confirm under the Supplemental Rules for Maritime and Admiralty Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure.

We await your prompt response to the foregoing and reserve our client's rights in this matter.

Regards,

Coleen A. McEvoy

A handwritten signature in black ink, appearing to read 'Coleen', followed by a large, stylized loop that extends to the right.

CAM/bhs
Enclosure

cc: Hon. Sandra L Townes
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

via Email jkim@rhakimlaw.com; Facsimile: (718) 321-9799; and Regular Mail:

Garnishees DONG IK LEE;

IES Logistics Corp., DONG IK LEE, Officer, and
Smart Cargo Services, DONG IK LEE, Owner,
145-11 155th Street, Jamaica, NY 11434; and
14440 156th Street, Jamaica, NY 11434

From: NYSD_ECF_Pool@nysd.uscourts.gov
Sent: Thursday, December 17, 2009 11:36 AM
To: deadmail@nysd.uscourts.gov
Subject: Activity in Case 1:08-cv-05551-RMB Nanyuan Shipping Co. Limited v. Chorus Shipping Co. Ltd. Cashiers Registry Disbursement

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

United States District Court for the Southern District of New York

Notice of Electronic Filing

The following transaction was entered on 12/17/2009 at 11:35 AM EST and filed on 12/17/2009

Case Name: Nanyuan Shipping Co. Limited v. Chorus Shipping Co. Ltd.

Case Number: 1:08-cv-5551

Filer:

WARNING: CASE CLOSED on 10/20/2009

Document Number: No document attached

Docket Text:

CASHIERS OFFICE REGISTRY DISBURSEMENT as per [29] Order, dated 12/11/2009, from Judge Judge Richard M. Berman, on 12/15/2009 disbursed to pay DONG IK LEE \$233,714.49 Check No. 00884120 dated 12/15/2009 PICKED UP BY DUJEONG KIM 12/16/2009 (jd)

1:08-cv-5551 Notice has been electronically mailed to:

Kevin John Lennon kjl@lenmur.com

Dujeong Kim rhakim.jk@gmail.com

Coleen Ann McEvoy cam@lenmur.com

1:08-cv-5551 Notice has been delivered by other means to:

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
NANYUAN SHIPPING CO. LIMITED,

Plaintiff,

- against -

CHORUS SHIPPING CO. LTD.,

Defendant.
-----X

: 09 CV 5388 (SLT)

: ECF CASE

: **INTERROGATORIES**

PLEASE TAKE NOTICE that Plaintiff, NANYUAN SHIPPING CO. LIMITED, by its attorneys LENNON, MURPHY & LENNON, LLP, pursuant to Rule 34 and of the Federal Rules of Civil Procedure and Rule B(3)(a) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions hereby propounds the following interrogatories to be responded to by garnishees Dong Ik Lee and/or any bank(s) and/or financial institution(s) holding accounts of IES Logistics Corp. and/or Smart Cargo Service, including but not limited to, escrow accounts and/or accounts of any agent(s) of Dong Ik Lee to be answered under oath within thirty (30) days hereof:

All interrogatories herein relate to any and all funds restrained by Dong Ik Lee any bank(s) and/or financial institution(s) holding accounts of Dong Ik Lee, including but not limited to, escrow accounts and/or accounts of any agent(s) of Dong Ik Lee in response to the Ex Parte Order and Process of Maritime Attachment and Garnishment:

1. Please state the location of the funds released by check or other means by the Southern District of New York Court Registry, pursuant to two Orders issued in the cases entitled *Nanyuan Shipping Co. Limited v. Chorus Shipping Co. Ltd.*, 08-CIV-5551 (RMB) and *MUR Shipping BV, Amsterdam v. Chorus Shipping Co. Ltd.*, 08-CIV-5642 (VM) from the time

the funds were released by the Court Registry until the time the funds were deposited or otherwise held, the process by which Dong Ik Lee and/or any bank(s) and/or financial institution(s) holding accounts of Dong Ik Lee, including but not limited to, escrow accounts and/or accounts of any agent(s) of Dong Ik Lee restrained the above identified funds, including but not limited to, where and how the funds were held at or by Dong Ik Lee.

2. Please identify any and all banking/financial institutions and/or other institutions and/or any other location where Dong Ik Lee and/or any bank(s) and/or financial institution(s) holding accounts of Dong Ik Lee, including but not limited to, escrow accounts and/or accounts of any agent(s) of Dong Ik Lee is holding or has held funds, goods, chattels, letters of credit, deposits, credits, bills of lading, debts, monies, or any other funds settlement agreements, other property, credit and effects of, or other assets, tangible or intangible, in whatever form belong to, or in which there is a property interest due or being transferred to, from or for the benefit of Chorus Shipping Co. Ltd., including but not limited to, escrow accounts and/or accounts of any agent(s) of Dong Ik Lee.

3. At the time of service of the Ex Parte Order and Process of Maritime Attachment and Garnishment, had you, or have you since that time had or have you now in your possession, custody or charge, or actual or constructive control of any property, tangible or intangible, including, but not limited to: cash, checks, funds, credits, wire transfers, bank accounts, letters of credit, debts, freights, sub-freights, charter hire, sub-charter hire, and/or other assets of, belonging to, due or for the benefit of the said Defendant or nominees and the like belonging to or claimed by the Defendant CHORUS SHIPPING CO. LTD. individually or jointly with any other person or entity? If so, please specify what they were or are, their values, and identify each

joint or co-owner, and attach copies of any documents reflecting the identity and/or ownership of any such cash, check, funds, accounts, etc. as noted in the foregoing.

Dated: December 30, 2009

The Plaintiff,
NANYUAN SHIPPING CO. LIMITED

By: 

Coleen A. McEvoy
Kevin J. Lennon
LENNON, MURPHY & LENNON, LLC
420 Lexington Ave., Suite 300
New York, NY 10170
(212) 490-6050 – phone
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
NANYUAN SHIPPING CO. LIMITED,

Plaintiff,

- against -

CHORUS SHIPPING CO. LTD.,

Defendant.
-----X

: 09 CV 5388 (SLT)

: ECF CASE

: **INTERROGATORIES**

PLEASE TAKE NOTICE that Plaintiff, NANYUAN SHIPPING CO. LIMITED, by its attorneys LENNON, MURPHY & LENNON, LLP, pursuant to Rule 34 and of the Federal Rules of Civil Procedure and Rule B(3)(a) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions hereby propounds the following interrogatories to be responded to by garnishees IES Logistics Corp. and/or Smart Cargo Service and/or any bank(s) and/or financial institution(s) holding accounts of IES Logistics Corp. and/or Smart Cargo Service, including but not limited to, escrow accounts and/or accounts of any agent(s) of IES Logistics Corp. and/or Smart Cargo Service to be answered under oath within thirty (30) days hereof:

All interrogatories herein relate to any and all funds restrained by IES Logistics Corp. and/or Smart Cargo Service any bank(s) and/or financial institution(s) holding accounts of IES Logistics Corp. and/or Smart Cargo Service, including but not limited to, escrow accounts and/or accounts of any agent(s) of IES Logistics Corp. and/or Smart Cargo Service in response to the Ex Parte Order and Process of Maritime Attachment and Garnishment:

1. Please state the location of the funds released by check or other means by the Southern District of New York Court Registry, pursuant to two Orders issued in the cases entitled *Nanyuan Shipping Co. Limited v. Chorus Shipping Co. Ltd.*, 08-CIV-5551 (RMB) and *MUR Shipping BV, Amsterdam v. Chorus Shipping Co. Ltd.*, 08-CIV-5642 (VM) from the time the funds were released by the Court Registry until the time the funds were deposited or otherwise held, the process by which IES Logistics Corp. and/or Smart Cargo Service and/or any bank(s) and/or financial institution(s) holding accounts of IES Logistics Corp. and/or Smart Cargo Service, including but not limited to, escrow accounts and/or accounts of any agent(s) of IES Logistics Corp. and/or Smart Cargo Service restrained the above identified funds, including but not limited to, where and how the funds were held at or by IES LOGISTICS CORP. and/or Smart Cargo Service

2. Please identify any and all banking/financial institutions and/or other institutions and/or any other location where IES Logistics Corp. and/or Smart Cargo Service and/or any bank(s) and/or financial institution(s) holding accounts of IES Logistics Corp. and/or Smart Cargo Service, including but not limited to, escrow accounts and/or accounts of any agent(s) of IES Logistics Corp. and/or Smart Cargo Service is holding or has held funds, goods, chattels, letters of credit, deposits, credits, bills of lading, debts, monies, or any other funds settlement agreements, other property, credit and effects of, or other assets, tangible or intangible, in whatever form belong to, or in which there is a property interest due or being transferred to, from or for the benefit of Chorus Shipping Co. Ltd., including but not limited to, escrow accounts and/or accounts of any agent(s) of IES Logistics Corp. and/or Smart Cargo Service.

3. At the time of service of the Ex Parte Order and Process of Maritime Attachment and Garnishment, had you, or have you since that time had or have you now in your possession,

custody or charge, or actual or constructive control of any property, tangible or intangible, including, but not limited to: cash, funds, credits, wire transfers, bank accounts, letters of credit, debts, freights, sub-freights, charter hire, sub-charter hire, and/or other assets of, belonging to, due or for the benefit of the said Defendant or nominees and the like belonging to or claimed by the Defendant CHORUS SHIPPING CO. LTD. individually or jointly with any other person or entity? If so, please specify what they were or are, their values, and identify each joint or co-owner, and attach copies of any documents reflecting the identity and/or ownership of any such cash, funds, accounts, etc. as noted in the foregoing.

Dated: December 30, 2009

The Plaintiff,
NANYUAN SHIPPING CO. LIMITED

By: 

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